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18	Counsel for Defendant Google LLC	
19	LIMITED STATES	DISTRICT COURT
20	UNITED STATES	DISTRICT COURT
20	NORTHERN DISTRICT OF CAL	IFORNIA, OAKLAND DIVISION
21		, 1
22	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER	Case No. 4:20-cv-03664-YGR-SVK
	CASTILLO, and MONIQUE TRUJILLO,	DECLARATION OF JONATHAN TSE IN
23	individually and on behalf of themselves and	SUPPORT OF PLAINTIFFS'
	all others similarly situated,	ADMINISTRATIVE MOTION TO SEAL
24	Plaintiffs,	PORTIONS OF PLAINTIFFS' REPLY IN
25	Tidilitiis,	SUPPORT OF REQUEST FOR ORDER
23	v.	TO SHOW CAUSE RE SANCTIONS
26	GOOGLETT	(DKT. 535)
	GOOGLE LLC,	
27	Defendant.	Judge: Hon. Susan van Keulen, USMJ
28		

TSE DECLARATION ISO OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL

Case No. 4:20-cv-03664-YGR-SVK

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I, Jonathan Tse, declare as follows:

- I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 535.
- 3. On April 12, 2022, Plaintiffs filed their Reply in Support of Request for Order Requiring Google to Show Cause Why It Should Not Be Sanctioned For Discovery Misconduct. On April 12, 2022, I received an unredacted service copy of these documents.
- 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Document	Basis for Sealing
Plaintiffs' Reply in Support of	The information requested to be sealed contains Google's
Request for an Order For Google	highly confidential and proprietary information regarding
To Show Cause for Why It Should	highly sensitive features of Google's internal systems and
Not Be Sanctioned for Discovery Misconduct at:  Pages 1:4-9, 3:1, 3:14-15, 3:26, 4:2, 4:4-5, 4:7, 4:9-10, 4:19-20, 5:4, 5:8, 5:10, 5:13, 6:10, 6:12, 6:15-16, 6:21, 6:23, 7:1-2, 7:9-12, 7:14-16, 8:9, 8:14-15, 8:24, 8:26, 9:1, 9:6, 9:11-13, 9:20, 9:26, 11:18, 12:4-5, 14:2-3	operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
	relating to competing products.
Third Declaration of Mark C. Mao	The information requested to be sealed contains Google's
in Support of Plaintiffs' Request	highly confidential and proprietary information regarding

Case No. 4:20-cv-03664-YGR-SVK

- 1		
1	for Order to Show Cause Motion (Mao Reply Declaration) at:	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
2		projects, identifiers, data signals, and logs, and their
3	PDF Pages 3:10-13, 3:15-16, 3:18, 3:20-21, 3:24-27, 4:1-2, 4:5, 4:9,	proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of
4	4:12-14, 5:9	its business and is not generally known to the public or
5		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
6		designs, and business practices for operating and
7		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
8		Google's competitive standing as competitors may alter
9		their systems and practices relating to competing products.  It may also place Google at an increased risk of
10		cybersecurity threats, as third parties may seek to use the
11		information to compromise Google's internal practices relating to competing products.
12	Mao Reply Decl., Exhibit 1 at:	The information requested to be sealed contains Google's
13	PDF Page 2	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
14		operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
15		proprietary functionalities, that Google maintains as
16		confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
		Such confidential and proprietary information reveals
17		Google's internal strategies, system designs, and business practices for operating and maintaining many of its
18		important services, and falls within the protected scope of
19		the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
20		information could affect Google's competitive standing as
21		competitors may alter their systems and practices relating to competing products. It may also place Google at an
22		increased risk of cybersecurity threats, as third parties may
23		seek to use the information to compromise Google's internal practices relating to competing products.
24	Mao Reply Decl., Exhibit 2 at:	The information requested to be sealed contains Google's
	PDF Pages 2-4	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
25		operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
26		proprietary functionalities, as well as internal metrics, that
27		Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
28		Google's competitors. Such confidential and proprietary
		2 Casa No. 4:20 av 02464 VCD SVV

1		information reveals Google's internal strategies, system
2		designs, and business practices for operating and
		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
3		action. See Dkt. 81 at 2-3. Public disclosure of such
4		confidential and proprietary information could affect
5		Google's competitive standing as competitors may alter their systems and practices relating to competing products.
		It may also place Google at an increased risk of
6		cybersecurity threats, as third parties may seek to use the
7		information to compromise Google's internal practices
8	Mao Reply Decl., Exhibit 3	relating to competing products.  The information requested to be sealed contains Google's
8	(Transcript of March 23, 2022	highly confidential and proprietary information regarding
9	Hearing before Special Master	highly sensitive features of Google's internal systems and
10	Douglas Brush) at:	operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
11	Pages 5:12, 6:3, 12:16, 38:24-25,	proprietary functionalities, that Google maintains as
	39:19-20, 40:4, 41:1, 41:15, 43:17-	confidential in the ordinary course of its business and is not
12	19, 44:3, 44:22, 45:4, 47:24, 48:18, Index (PDF Pages 25, 28, 33)	generally known to the public or Google's competitors.
13		Such confidential and proprietary information reveals Google's internal strategies, system designs, and business
14		practices for operating and maintaining many of its
14		important services, and falls within the protected scope of
15		the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
16		information could affect Google's competitive standing as
17		competitors may alter their systems and practices relating to
1/		competing products. It may also place Google at an
18		increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal
19		practices relating to competing products.
	Mao Reply Decl., Exhibit 4	The information requested to be sealed contains Google's
20	(GOOG-BRWN-00846508) at:	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
21	Sealed in its entirety	operations, including various types of Google's internal
22		projects, identifiers, data signals, and logs, and their
		proprietary functionalities, as well as internal metrics, that
23		Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
24		Google's competitors. Such confidential and proprietary
25		information reveals Google's internal strategies, system
		designs, and business practices for operating and maintaining many of its important services, and falls within
26		the protected scope of the Protective Order entered in this
27		action. See Dkt. 81 at 2-3. Public disclosure of such
28		confidential and proprietary information could affect Google's competitive standing as competitors may alter
		Google's compensive standing as compensions may after

1		their systems and practices relating to competing products.
$_{2}\Vert$		It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
3		information to compromise Google's internal practices relating to competing products.
4	Mao Reply Decl., Exhibit 5	The information requested to be sealed contains Google's
4	(GOOG-CABR-03849022) at:	highly confidential and proprietary information regarding
5	(	highly sensitive features of Google's internal systems and
	Sealed in its entirety	operations, including various types of Google's internal
6		projects, identifiers, data signals, and logs, and their
7		proprietary functionalities, as well as internal metrics, that
		Google maintains as confidential in the ordinary course of
8		its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
9		information reveals Google's internal strategies, system
10		designs, and business practices for operating and maintaining many of its important services, and falls within
_		the protected scope of the Protective Order entered in this
11		action. See Dkt. 81 at 2-3. Public disclosure of such
12		confidential and proprietary information could affect
13		Google's competitive standing as competitors may alter
13		their systems and practices relating to competing products.
14		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
15		information to compromise Google's internal practices
		relating to competing products.
16	Mao Reply Decl., Exhibit 6	The information requested to be sealed contains Google's
17	(Stipulation) at:	highly confidential and proprietary information regarding
	Pages 1:22, 2:6-7, 2:12, 2:15, 3:3,	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
18	3:6, 3:9, 3:11-3:28, 4:1-9, 4:12, 4:15	projects, identifiers, data signals, and logs, and their
19		proprietary functionalities, that Google maintains as
20		confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
21		Such confidential and proprietary information reveals Google's internal strategies, system designs, and business
22		practices for operating and maintaining many of its
22		important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-
23		3. Public disclosure of such confidential and proprietary
24		information could affect Google's competitive standing as
25		competitors may alter their systems and practices relating to
		competing products. It may also place Google at an increased risk of experience with threats, as third parties may
26		increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal
27		practices relating to competing products.
	Declaration of Christopher	The information requested to be sealed contains Google's
28	Thompson in Support of Plaintiff's	highly confidential and proprietary information regarding
- 11		

1	Request for an Order to Show Cause at:	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
2		projects, identifiers, data signals, and logs, and their
3	PDF Pages 3:25, 4:19-20, 4:26-27, 5:2-7, 5:9, 5:17-19, 5:21 5:23, 6:3-5,	proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of
4	6:8, 6:10-11, 6:15, 6:17-19, 6:21, 6:24, 7:10, 7:26, 8:1-2, 8:4, 9:14-15,	its business and is not generally known to the public or
5	9:17-18, 9:22	Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
6		designs, and business practices for operating and
7		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
8		Google's competitive standing as competitors may alter
9		their systems and practices relating to competing products.  It may also place Google at an increased risk of
10		cybersecurity threats, as third parties may seek to use the
11		information to compromise Google's internal practices relating to competing products.
12	Thompson Decl., Exhibit B-1	The information requested to be sealed contains Google's
13	(GOOG-CABR-05256755) at:	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
14	Sealed in its entirety	operations, including various types of Google's internal
15		projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that
16		Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
17		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
18		designs, and business practices for operating and
19		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
		action. See Dkt. 81 at 2-3. Public disclosure of such
20		confidential and proprietary information could affect Google's competitive standing as competitors may alter
21		their systems and practices relating to competing products.
22		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
23		information to compromise Google's internal practices relating to competing products.
24	Thompson Decl., Exhibit B-2	The information requested to be sealed contains Google's
25	(GOOG-CABR-00799341) at:	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
26	PDF Page 2	operations, including various types of Google's internal
27		projects, identifiers, and their proprietary functionalities, Google maintains as confidential in the ordinary course of
28		its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
20		Google's compeniors. Such confidential and proprietary

1		information reveals Google's internal strategies, system
2		designs, and business practices for operating and
2		maintaining many of its important services, and falls within
3		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
4		confidential and proprietary information could affect
4		Google's competitive standing as competitors may alter
5		their systems and practices relating to competing products.
4		It may also place Google at an increased risk of
6		cybersecurity threats, as third parties may seek to use the
7		information to compromise Google's internal practices
8	Thompson Decl., Exhibit C	relating to competing products.  The information requested to be sealed contains Google's
0	(GOOG-CABR-04773853) at:	highly confidential and proprietary information regarding
9		highly sensitive features of Google's internal systems and
10	Sealed in its entirety	operations, including various types of Google's internal
10		projects, identifiers, data signals, and logs, and their
11		proprietary functionalities, as well as internal metrics, that
12		Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
12		Google's competitors. Such confidential and proprietary
13		information reveals Google's internal strategies, system
14		designs, and business practices for operating and
		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
15		action. See Dkt. 81 at 2-3. Public disclosure of such
16		confidential and proprietary information could affect
17		Google's competitive standing as competitors may alter
17		their systems and practices relating to competing products.
18		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
19		information to compromise Google's internal practices
		relating to competing products.
20	Thompson Decl., Exhibit D	The information requested to be sealed contains Google's
21	(GOOG-CABR-03652549) at:	highly confidential and proprietary information regarding
	Sealed in its entirety	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
22		projects, identifiers, data signals, and logs, and their
23		proprietary functionalities, as well as internal metrics, that
		Google maintains as confidential in the ordinary course of
24		its business and is not generally known to the public or
25		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
26		designs, and business practices for operating and
20		maintaining many of its important services, and falls within
27		the protected scope of the Protective Order entered in this
28		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
20		confidential and proprietary information could affect

1 2 3 4	Google's competitive standing as competitors may alter their systems and practices relating to competing products.  It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.		
5			
6	5. Google's request is narrowly tailored in order to protect its confidential information.		
7	These redactions are limited in scope and volume. Because the proposed redactions are narrowly		
8	tailored and limited to portions containing Google's highly-confidential or confidential information,		
9	Google requests that the portions of the aforementioned documents be redacted from any public		
10	version of those documents.		
	6. Google does not seek to redact or file under seal any of the remaining portions of		
11	Plaintiffs' Reply not indicated in the table above.		
12			
13	I declare under penalty of perjury of the laws of the United States that the foregoing is true		
14	and correct. Executed in San Francisco, California on April 18, 2022.		
15			
16	DATED: April 18, 2022 QUINN EMANUEL URQUHART &		
17	SULLIVAN, LLP		
18			
19	By /s/ Jonathan Tse		
20	Jonathan Tse		
21	Attorney for Defendant		
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	7 Casa No. 4:20 av 03664 VGP SVV		